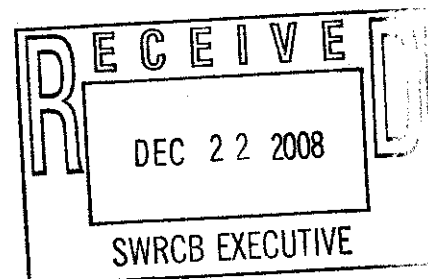


Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

From: "Robert Dolezal" <rdolezal@cangc.org>
To: commentletters@waterboards.ca.gov
Date: Mon, Dec 22, 2008 11:18 AM
Subject: 1/6/09 BOARD MEETING BOARD HEARING Recycled Water Policy

TO: Secretary, California State Water Board

RE: Letter of comment regarding proposed Recycled Water Policy on behalf of California Association of Nurseries and Garden Centers



The California Association of Nurseries and Garden Centers (CANGC) strongly supports in concept increasing the reuse of recycled water for non-potable irrigation and to replenish aquifers that supplement and recycle potable water supplies. We submit the following specific comments on the draft proposal currently before the State Water Board:

1. Preamble: This recitation of symptoms does not address the fundamental causes of the effects enumerated: long-term failure of planning and execution over decades to provide expansion of sound surface and sub-surface storage, delivery mechanisms, and planned urban development in the face of rapid population growth, intense environmental opposition, and legal actions to limit the state's options. The impact of not building infrastructure and establishing growth and development planning focused on water resource conservation has greatly exacerbated the water withdrawals from the Bay-Delta ecosystem during the predictable seasonally dry periods and drought sequences typical of California's Mediterranean climate system. Addressing symptoms without providing cures for the long-term causal agents will at most provide a short-term stemming of the hemorrhaging from lack of comprehensive water supply and delivery infrastructure.
2. Preamble (Goals 1 & 2): Doubling the amount of available recycled water over an 18 year period and redoubling in the following 10 years is an insufficient goal given the potential resource and current technology. Similarly, treatment and storage or well-injection of storm-water runoff into underground aquifers should be given much more aggressive targets. CANGC believes that both sources are highly viable augmentation methodologies for water supply, sources that avoid the high cost and evaporative losses of surface transport of new freshwater supplies in arid climate areas.
3. Preamble (Goal 3): CANGC has been an active participant in the 20X2020 workshops associated with development of a methodology and allocation system to deliver a 20% water conservation target. Despite this involvement, we strongly believe that the process is delivering untenable results that will fail to achieve its objectives. Focus on evapotranspiration rates coupled with a faulty hydrologic region focus means that the low conservation goals proposed for high population centers will transfer water conservation into sparsely populated regions at much-magnified levels. The environmental impact of these proposed policies will create wholesale changes to the urban and suburban environment, including loss of green spaces, trees, landscaping, and

other desirable features. It will create urban heat islands that will exacerbate the problems currently being faced, increase energy consumption and production of greenhouse gases, and further unbalance the environment in California's Central Valley. Tiered market-rates imposed equally throughout the state have demonstrated their efficacy by allowing normal market forces to impose conservation without regulatory action and are a much more efficient and certain mechanism for achieving conservation goals such as those set forth by Governor Schwarzenegger.

4. Preamble (Goals, general): CANGC believes that a goal should be included in the policy for non-potable recycled water to be used for irrigation in industrial, special-use (e.g. golf courses), and residential development landscaping.

5. Mandate [paragraph 4(c)]: The objective of raising \$1 billion in light of likely scenarios over the period 2009-2020 for state borrowing, inflation, and interest-rate costs is both insufficient and improbable. A tiered-rate market pricing structure that incentivized water producing agencies to offer recycled water product would be much more efficient than governmental expenditure and would procure the same amount of infrastructure at much lower cost to the taxpayers.

6. Adoption of Salt/Nutrient Management Plans [paragraph 6(2)]: A one-year period for Regional Water Boards to develop and consider implementation plans provides insufficient time for adequate industry and public input. This is exacerbated by the budget crisis at the state and local levels.

7. Landscape Irrigation Projects [paragraph 7(a)(3)]: CANGC believes that precipitation sensor interruption controllers should be mandated on all newly installed residential, industrial, and commercial irrigation projects in the state and local water agencies should provide inducements for retrofit of existing systems with such capabilities in a manner similar to their appliance and toilet rebate programs. The policy would benefit from such addition.

8. Landscape Irrigation Projects [paragraph 7(c)(4)]: The policy should provide provision equivalent to paragraph 8(a) for mandatory monitoring of fertilizer nutrient levels in aquifers beneath recycled irrigation application areas wherever dissolved nutrients in recycled water exceed threshold levels. Such a policy would allow measurement of trends over time affecting the quality of the water in the aquifer and permit remedies should the trend approach health limits.

Respectfully submitted,

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California Association of Nurseries & Garden Centers (CANGC)

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Plan to Attend

Grower Summit - June 2, 2009

at the Santa Ana Doubletree Hotel

California Grown Show - June 3, 2009

at the Orange County Fairgrounds

CC: "Robert Dolezal" <rdolezal@cangc.org>